



08-CV-00381-RCPT

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KELLY N. HANSEN,  
Plaintiff,

v.

CHILDREN'S HOSPITAL AND  
REGIONAL MEDICAL CENTER,  
INC., a Washington corporation and  
MARTHA A. DIMMERS, an individual,  
Defendants.

No. 08-0381L

**STIPULATED MOTION**

**-AND-**

**[PROPOSED] ORDER EXTENDING  
DISCOVERY DEADLINE FOR  
LIMITED PURPOSE**

**NOTE FOR HEARING: 12/14/2009**

**STIPULATION**

The parties, by and through their undersigned counsel, stipulate and jointly move the Court as follows:

1. By Minute Order dated September 17, 2009, the Court set the trial date and related deadlines in this matter. The Order provides, in pertinent part, that discovery must be completed by January 3, 2010.

2. Due to illness of witnesses and various scheduling conflicts, the parties have a few depositions that they will not be able to complete prior to January 3, 2010. Specifically, Plaintiff wants to depose Ruth Benfield, Cheryl Clarke and Kristin Johnson, and Defendant wants to depose Plaintiff's counselor,

1 Melicent Whinston. The parties agree that it would be desirable to allow such  
2 discovery, and that it can be completed prior to the end of January without  
3 affecting any of the other deadlines in the case.

4 3. In light of the above, the parties jointly seek an extension of the  
5 discovery deadline in this case to January 29, 2010 for the limited and sole  
6 purpose of allowing the parties to take the depositions of Ruth Benfield, Cheryl  
7 Clarke, Kristin Johnson, and Melicent Whinston, and to conduct follow up  
8 discovery, if any, necessitated by new issues raised during such depositions that  
9 could not have been anticipated previously.

10 STIPULATED and AGREED this 14<sup>th</sup> day of December, 2009.

11  
12 RIDDELL WILLIAMS P.S.

13  
14 By: s/ Karen F. Jones  
15 Karen F. Jones, WSBA #14987  
16 Skylar A. Sherwood, WSBA #31896  
17 Attorneys for Defendants

18 GORDON THOMAS HONEYWELL  
19 MALANCA PETERSON


20  
21 By: s/ Andrea H. McNeely (approval via email  
22 12/11/09)  
23 James Walter Beck, WSBA #34208  
24 Andrea H. McNeely, WSBA #36156  
25 Bryan D. Doran, WSBA #38480  
26 Attorneys for Plaintiff

**ORDER**

The parties having jointly stipulated and agreed, IT IS HEREBY ORDERED:

1. The deadline for completing all discovery in this case shall be extended until January 29, 2010, for the limited and sole purpose of allowing the parties to take the depositions of Ruth Benfield, Cheryl Clarke, Kristin Johnson, and Melicent Whinston, and to conduct follow up discovery, if any, necessitated by new issues raised during such depositions that could not have been anticipated previously.

DATED this 16<sup>th</sup> day of December, 2009/~~2010~~.

  
\_\_\_\_\_  
Honorable Robert S. Lasnik  
United States District Court Judge

Presented by:

RIDDELL WILLIAMS P.S.

By: s/ Karen F. Jones  
Karen F. Jones, WSBA #14987  
Skylar A. Sherwood, WSBA #31896  
Attorneys for Defendants

GORDON THOMAS HONEYWELL MALANCA PETERSON

By: s/ Andrea H. McNeely (approval via email 12/11/09)  
James Walter Beck, WSBA #34208  
Andrea H. McNeely, WSBA #36156  
Bryan D. Doran, WSBA #38480  
Attorneys for Plaintiff

STIPULATED MOTION AND ORDER EXTENDING DISCOVERY  
DEADLINE FOR LIMITED PURPOSE (08-0381) - 3  
4822-7892-8389.01  
121409/1459

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